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Other:	GAE Corp
	7-13-93

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TO: DAVID A. HOEFER, Esq.

FIRM NAME: U.S. EPA - REGION VII

TELEPHONE NO.: 913/551-7503

TELECOPIER NO.: 913/551-7925

DATE: JULY 13, 1993

FROM: PETER S. STRASSNER

ATTY/CLIENT/MATTER NO.: 211/2868/63843

TOTAL NUMBER OF PAGES, INCLUDING THIS PAGE: 9

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THANK YOU,

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MESSAGE:

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In a 8/14/96 telephone conversation, Peter Strassner told Dave Hoefer to keep the confidentiality of this for the document attached to make any claim. Not intend to ship for, and did have Campbell sign now. 1:04 PM 8/15/96

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July 13, 1993

**VIA TELECOPY/HARD COPY WITH ENCLOSURES
TO FOLLOW BY FEDERAL EXPRESS**

David A. Hoefer, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Response of GAF Corporation to the CERCLA 104(e)
Information Request Issued by EPA Region VII, Dated
April 20, 1993 (the "Information Request")

Dear Mr. Hoefer:

We represent GAF Corporation (GAF). We are in receipt of
the above-referenced Information Request.

As you are aware, upon receipt of the Information
Request, we contacted you to determine the nature of EPA Region
VII's concerns. By letter dated May 21, 1993, we also formally
filed a Freedom of Information Act (FOIA) request in which we
requested copies of all documents which relate to the environmental
problem that is the subject of the Information Request.

You indicated that some portion of the banks of Maline
Creek which run adjacent to the former GAF and CertainTeed
Corporation sites was eroding and that asbestos containing pipe and
possibly other material was, as a consequence, being washed or
released into Maline Creek. You also indicated that EPA was
concerned with certain loose asbestos containing material contained
in a building, but that the building was located on the former
CertainTeed site.

Accordingly, GAF has responded to the Information Request
with the information and documents relating to the closure

David A. Hoefer, Esq.
July 13, 1993
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or irrelevant to the concerns identified by EPA, as set forth above, GAF objects to such requests on the grounds that they are irrelevant, unduly broad, burdensome, and exceed EPA's information gathering authority under 42 U.S.C. §9604 and, as such, are arbitrary and capricious.

While the attached responses are subject to the foregoing understandings, limitation on scope of response and objections, GAF has attempted to provide the information which it believes is of interest to EPA, based on EPA's descriptions. If, after reviewing the attached responses, EPA desires additional information or further elaboration on information provided, please contact the undersigned.

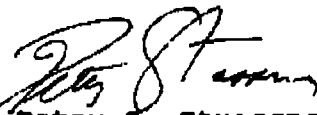
GAF has not yet received any response by EPA to GAF's FOIA request. Further, the facility that is the subject of the Information Request is no longer owned or operated by GAF. GAF has searched and continues to search for documents relevant to the matter at its other facilities. Accordingly, GAF reserves the right to further supplement or amend its responses should information revealed by EPA's response to GAF's FOIA request, or information revealed by further review of GAF's documents, indicate that such a supplement or amendment is warranted.

GAF's response includes several engineering drawings. Accordingly, the attachments to GAF's response will be provided to EPA along with the hard copy of the text of the response. You indicated yesterday that this method of responding (faxing the text today and mailing a hard copy of the text and attachments) was acceptable to you.

If, after reviewing the foregoing response you have any questions or concerns, please direct the same, as well as all other correspondence with respect to this matter, to the undersigned. We appreciate your cooperation and assistance in the handling of this matter.

Very truly yours,

THOMPSON & MITCHELL

By 
Peter S. Strassner

PSS/cc

Enclosures

cc: Michael D. Scott, Esq. (w/encl.)
Stephen G. Jeffery, Esq.

RESPONSES OF GAF CORPORATION TO
THE APRIL 20, 1993 CERCLA 104(e) INFORMATION
REQUEST ISSUED BY EPA REGION VII
July 13, 1993

QUESTIONS

1. Identify all persons consulted, and all documents reviewed in the preparation of responses to this Information Request.

Answer: The following persons were consulted in the preparation of this response:

Paul Reitz, Reitz & Jens, Inc., 1055 Corporate Square Drive, St. Louis, Missouri 63132

David Murray, Reitz & Jens, Inc., 1055 Corporate Square Drive, St. Louis, Missouri 63132

Murray Sherman, GAF Corporation, 1361 Alps Road, Wayne, New Jersey 07470

Charles Bien, c/o GAF Corporation, 1361 Alps Road, Wayne, New Jersey 07470

Randy Ford, GAF Corporation, P. O. Box 665607, Dallas, Texas 75265

The following documents were the primary documents reviewed and relied on in the preparation of this response:

Reitz & Jens, Inc. drawings:

- (1) GAF Corporation aerial photograph taken 3-6-79 (attachment 1);
- (2) GAF Corporation Site Plan dated 3-15-79 (attachment 2);
- (3) GAF Corporation Waste File Proposed Grading Plan dated 7-14-79 (attachment 3);
- (4) Plat of Secured Asbestos Cement File - GAF Corporation (attachment 4);

The responses of GAF Corporation to the April 20, 1993 CERCLA 104(e) Information Request are subject to the objections, reservations, conditions and explanations contained in the cover letter of Peter S. Strassner, Esq. of Thompson & Mitchell dated as of even date herewith, which objections, reservations, conditions and explanations are incorporated herein by this reference.

(5) Plat of Secured Asbestos Cement Pile - Certain-Teed Products, Inc. (attachment 5);

Letter from Earl F. Holtgraewe, P. E., Regional Administrator, St. Louis Regional Office, Missouri Department of Natural Resources, dated June 2, 1980 (attachment 6);

Letter from Louise D. Jacobs, Director, Enforcement Division, U. S. EPA Region VII, dated April 28, 1980 (attachment 7);

Letter from Missouri Department of Natural Resources (MDNR) to Mr. Jim Keating of the Metropolitan St. Louis Sewer District (MSD) (dated March 14, 1982) regarding additional cleanup of ACM concrete pipe scrap (attachment 8);

Letter (unsigned) from MDNR to St. Louis County Dept. of Community Health and Medical Care (dated May 13, 1982) describing exposed area of Maline Creek located on the former CertainTeed property (attachment 9);

Letter from St. Louis County to Missouri Air Conservation Commission (dated May 6, 1982) informing the State about concrete pipe scrap littering from the former CertainTeed facility (attachment 10);

Memorandum to A. Groner (MDNR) from M. Duvall (MDNR) regarding CERCLA Notification Site Inspection - CertainTeed Corporation (dated January 8, 1982) (attachment 11);

Joint Public Notices by U.S. Army Corps of Engineers and State of Missouri, both dated June 24, 1980 (attachment 12 and 13);

Letter to MDNR from Reitz & Jens (dated May 6, 1980) regarding GAF waste pile closure (attachment 14);

Letter to MDNR from Reitz & Jens (dated May 5, 1980) regarding CertainTeed waste pile closure (attachment 15);

Memorandum from E. Holtgraewe, Regional Administrator, MDNR, to R. Robinson, Director, MDNR Solid Waste Management Program (dated January 21, 1980) regarding final inspection - asbestos waste site closure GAF-CertainTeed products (attachment 16).

In addition to the attachments to this letter, the publicly available files of Missouri Department of Natural Resources (St. Louis Regional office) (MDNR) and all documents contained therein were reviewed. GAF also searched and continues to search its records for relevant

documents. Some, but not many, relevant documents were located in GAF's internal search. If an index of MDNR and GAF documents is needed, please contact Peter S. Strassner, Esq. of Thompson & Mitchell law firm.

2. Identify all persons, including Respondent's employees, who have knowledge, information or documents pertaining to the generation, use, treatment, storage, disposal or other handling of hazardous substances at the Site.

Answer: The following GAF employees or former employees have knowledge, information or documents pertaining to the response action conducted in 1979-1980 at the former GAF site:

Murray Sherman, GAF Corporation, 1361 Alps Road, Wayne, New Jersey 07470

Charles Bien, c/o GAF Corporation, 1361 Alps Road, Wayne, New Jersey 07470

Randy Ford, GAF Corporation, P. O. Box 665607, Dallas, Texas 75265

Other GAF employees and former GAF employees who worked at the Riverview Blvd. plant during the relevant time period or who were otherwise familiar with operations at that plant have or may have "knowledge, information or documents pertaining to the generation, use, treatment, storage or disposal or other handling of hazardous substance at the site;" however, the above individuals were consulted as the individuals still accessible to GAF who had knowledge or recollection of or involvement in the response action taken with regard to the asbestos containing material (ACM) pile in 1979-1980.

3. Describe the nature of your activities at the Site, particularly with respect to the processing, storage, treatment, disposal, or other handling of asbestos or asbestos containing material ("ACM").

Answer: GAF made ACM panels and other ACM cement sheet products used in or for shelters, chicken coops, cooling towers and a variety of other uses. It also made shingles and roofing insulation at the facility. No individual consulted ever recalled GAF manufacturing ACM pipe at the Riverview Blvd. facility. The ACM panel manufacturing process may be described as follows: cement, limestone and silica were received at the facility in bulk. Asbestos fibers were received in two cubic foot compressed packages. These materials were combined in a horizontal mixer (dry) and then discharged and mixed with water to form a slurry. This slurry was discharged into a series of vats where the slurry was deposited on cylinder screens. The solids from the slurry were then transferred to a felt where the thickness was built up. The material was then transferred from the felt to an accumulator drum,

was cut off, traveled down a conveyor, cut to appropriate panel sizes and automatically stacked.

Water from the vats from the continual process and cleanup was pumped to settling ponds located on the pile at the site. These ponds had a base of hard mineral fiber waste which functioned as a filter bed for this process water. The water leaving the site was treated (with sulfuric acid) to neutralize the pH and was discharged clear with a neutral pH.

4. Identify the time periods during which you operated at and/or owned the Site.

Answer: GAF Corporation owned or operated its Riverview Blvd. facility from approximately 1968 to 1983.

5. Did you acquire any portion of the Site after the disposal or placement of asbestos or ACM on the Site? Describe all of the facts on which you base the answer to this question.

Answer: Yes. GAF acquired the facility as part of a larger transaction in or about 1968. The facility is believed to have been built around 1927 by Eternit Mills, a Dutch company. GAF believes Ruberoid Corporation purchased the facility around 1937 and continued to run the plant until 1968. The ACM pile was already present at the facility when GAF acquired it in or about 1968 according to the recollections of the individuals consulted in preparing these responses.

6. Identify all solid waste units (e.g., waste piles and landfills) located at the Site during the period that you owned/operated the Site. For each unit identified, provide the following information:

- a. The type and dimensions of the unit;
- b. The dates that the unit was in use;
- c. The quantity and types of materials placed in the unit;
- d. The construction of the unit;
- e. How the unit was closed and what actions were taken to prevent or address potential or actual releases of asbestos or ACM from the unit; and
- f. If available, provide a map showing the unit's boundaries and the location of all known solid waste units.

Answer: The settling basins for the material originating from the mineral fiber process and cleanup are depicted in attachment 1. The elevations for these settling basins are depicted in attachment 2. In 1979-1980, these settling basins were closed and the asbestos containing materials (ACM) were isolated in secured asbestos cement piles in accordance with work plans developed by the consulting engineering firm of Reitz & Jens, Inc. (Reitz &

Jens). The closure was conducted by contouring the settling basins, covering the entire area with a minimum of one (1) foot of soil cover, reseeding the entire area, and placing rock banking along Maline Creek. The secured asbestos cement pile was located above the Maline Creek Floodway as designated by MSD Ordinance No. 121. In conjunction with the closure activities, discharges from the facility were eliminated. The closure plans are depicted in attachment 3. The work plans, specifications, and the completion of the final closure activities were reviewed and approved by both the Missouri Department of Natural Resources and EPA in attachments 6 and 7, respectively. Following completion of the closure activities, plats documenting the location of the secured asbestos cement pile were recorded. As indicated, the practices of filtering process and wash water in basins on the pile pre-dated GAF's acquisition of the facility. GAF does not know when the practice commenced. If additional information is required, please request the same.

7. Did you at any time while you operated at and/or owned the Site perform any investigations of the soil, water (ground or surface), geology, hydrology, or air quality on or about the Site? If so, what were the results? Provide copies of all reports, etc., pertaining to such investigations.

Answer: According to Dave Murray, Project Manager for Reitz & Jens, air monitoring equipment was in place during and in connection with the closure activities described in paragraph 6. Mr. Murray specifically recalls that none of the air monitoring test results indicated any release or presence of asbestos or ACM in the atmosphere during the remedial activities. Neither GAF nor Reitz & Jens, to date, have been able to locate any documents evidencing the monitoring conducted during the closure activities.

8. Did you at any time while you operated at and/or owned the Site perform any removal or remedial activities with regard to hazardous substances at the Site? If so, provide copies of all documents, reports, etc., pertaining to such activities.

Answer: See response to questions 1 and 6. If additional information is needed, please contact Peter S. Strassner, Esq. of Thompson & Mitchell law firm.

9. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of asbestos or ACM at or from the Site.

Answer: The activities of the previous owners of GAF's former Riverview Blvd. facility may have caused the release or threat of release of asbestos or ACM at or from the site. In addition, CertainTeed corporation operated a facility adjacent to the GAF facility. CertainTeed manufactured asbestos containing pipe (and possibly other materials) and is a distinct entity not related to GAF Corporation. Reitz & Jens was also retained by CertainTeed

Corporation in or about 1979-1980 to close an adjacent asbestos containing pile on the CertainTeed property. GAF currently has insufficient information to determine the extent to which the subsequent owners of the GAF and/or CertainTeed facilities have caused or contributed to any release or threat of release of asbestos or ACM from the former GAF or CertainTeed sites. Additional ACM cement pipe litter was discovered in 1982 in Maline Creek adjacent to the former CertainTeed facility (see attachments 8-11).

10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

Answer: Mr. Earl Holtgraewe, P. E., a former Regional Director of the St. Louis Regional Office, Missouri Department of Natural Resources, and Ms. Louise D. Jacobs, a former Director of the Enforcement Division, U. S. EPA Region VII may have additional knowledge concerning the review/approval of the work plans and closure activities. Mr. Holtgraewe is presently employed by the City of St. Peters, Missouri. Ms. Jacobs' present position is not known to GAF. CertainTeed Corporation (believed to be a U.S. subsidiary of Saint-Gobain) presumably has additional information and/or documents. The subsequent and current owners may also be able to provide additional relevant information or documents. Further, the U.S. Army Corps of Engineers and/or the St. Louis Metropolitan Sewer District may have additional relevant information or documents.

In addition, on May 21, 1993, GAF submitted a request to EPA Region VII pursuant to the Freedom of Information Act requesting information in EPA's possession concerning the sites and the work performed there in 1979-1980. As of this date, GAF has not received EPA's response. GAF believes that personnel in EPA Region VII should also be in possession of relevant information concerning this matter.

11. For every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained.

Answer: See responses to questions 9 and 10 above.

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